## Applied Communications Technology

INFORMATION SERVICES

February 3, 2006

Marlene H. Dortch, Secretary Federal Communications Commission 445 12<sup>th</sup> Street, S.W. Washington, D.C. 20554

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Re: Certification of CPNI Filing
EB-06-TC-060
EB Docket No. 06-36

Dear Ms. Dortch:

Transmitted herewith in accordance with the Commission's Public Notice, DA 06-223, released January 30, 2006, and Section 64.2009(e) of the Commission's Rules, is our compliance certificate and accompanying statement for the year ended December 31, 2005.

Sincerely,

Steven T. Koller

Treasurer

## **CERTIFICATION**

I, Steven T. Koller, hereby certify this 3<sup>rd</sup> day of February, 2006 that I am an officer of Applied Communications Technology, Inc. and that I have personal knowledge that Applied Communications Technology, Inc. has established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules set for in 47 C.F.R. 64.2001-2009.

Steven T. Koller

Treasurer, Applied Communications Technology, Inc.

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## **STATEMENT**

Applied Communications Technology, Inc. has established operating procedures that ensure compliance with the Federal Communications Commission ("Commission") regulations regarding the protection of consumer proprietary network information ("CPNI").

- Applied Communications Technology, Inc. has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Applied Communications Technology, Inc. continually educates and trains its employees regarding
  the appropriate use of CPNI. Applied Communications Technology Inc. has established disciplinary
  procedures should an employee violate the CPNI procedures established by Applied Communications
  Technology, Inc.
- Applied Communications Technology, Inc. maintains a record of its and its affiliates' sales and marketing Campaigns that use its customers' CPNI. Applied Communications Technology, Inc. also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Applied Communications Technology, Inc. has established a supervisory review process regarding
  compliance with the CPNI rules with respect to outbound marketing situations and maintains records
  of carrier compliance for a minimum period of one year. Specifically, Applied Communications
  Technology, Inc. sales personnel obtain supervisory approval of any proposed outbound marketing
  request for customer approval regarding its CPNI.